

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

<b>1 TOM PLUMBER GLOBAL INC.</b>	:	Case No.: 1:25-CV-00396
	:	
Plaintiff,	:	Judge Jeffery P. Hopkins
	:	
v.	:	
	:	
<b>BLUE RIDGE PLUMBING AND DRAIN LLC, et al.,</b>	:	
	:	
	:	
Defendants.	:	

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**PLAINTIFF’S MOTION FOR EXPEDITED DISCOVERY**

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Pursuant to Rules 26, 30, 33, and 34 of the Federal Rules of Civil Procedure, Plaintiff 1 Tom Plumber Global Inc. (“1 Tom Plumber”), by and through counsel, respectfully moves for an Order of expedited discovery in this case so that the parties can promptly prepare for a hearing on 1 Tom Plumber’s Motion for Preliminary Injunction. 1 Tom Plumber requests that the Court order Defendants Blue Ridge Plumbing and Drain LLC, Josh Warren, Toni Warren, and Michael Perdue to provide their responses to 1 Tom Plumber’s discovery requests within seven (7) days after service of the same and to produce any party witness for a deposition reasonably in advance of the Preliminary Injunction Hearing.

Attached is a Memorandum in Support of the instant Motion, a proposed order granting the Motion, Plaintiff’s First Set of Interrogatories and Requests for Production of Documents Directed to Defendant Blue Ridge Plumbing and Drain LLC, Plaintiff’s First Set of Interrogatories and Requests for Production of Documents Directed to Josh Warren and Toni Warren, and Plaintiff’s First Set of Interrogatories and Requests for Production of Documents Directed to Defendant Michael Perdue.

Respectfully submitted,

/s/ Melissa A. Springer

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***Counsel for Plaintiff***

***1 Tom Plumber Global Inc.***

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing is being served with the Verified Complaint for Temporary Restraining Order, Preliminary Injunction, Permanent Injunction, and Other Relief, upon the following:

Blue Ridge Plumbing and Drain LLC  
174 Bradley Branch Road, Ste 3  
Arden, NC 28704  
*Defendant*

Josh Warren  
201 Brandon Road  
Hendersonville, NC 28739  
*Defendant*

Blue Ridge Service Group LLC  
174 Bradley Branch Road, Suite 4  
Arden, NC 28704  
*Defendant*

Toni Warren  
201 Brandon Road  
Hendersonville, NC 28739  
*Defendant*

Warren Restoration, LLC  
9 Legend Drive  
Arden, NC 28704  
*Defendant*

Michael Perdue  
4 Eola Avenue  
Asheville, NC 28806  
*Defendant*

TLC Properties LLC  
201 Brandon Road  
Hendersonville, NC 28739  
*Defendant*

Trina Ellison  
174 Bradley Branch Rd, Ste 3  
Arden, NC 28704  
*Defendant*

TLC Service Group, LLC  
174 Bradley Branch Road, Suite 5  
Arden, NC 28704  
*Defendant*

Piedmont Plumbing and Drain, LLC  
9 Legend Drive  
Arden, NC 28704  
*Defendant*

/s/ Melissa A. Springer  
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